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*Attorneys for Defendant
Wal-Mart Stores, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUTH ANN STEDEFORD,

Plaintiff,

v.

WAL-MART STORES, INC., and DOES I-X
and ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No.: 2:14-cv-01429-JAD-PAL

**STIPULATION ESTABLISHING
PARAMETERS FOR FRCP 34 SITE
INSPECTION BY PLAINTIFF RUTH
ANN STEDEFORD**

COME NOW, Plaintiff RUTH ANN STEDEFORD, by and through her counsel of record, the law firm of INJURY LAWYERS OF NEVADA, and Defendant WAL-MART STORES, INC. ("Walmart"), by and through its counsel of record, the law firm of PHILLIPS, SPALLAS & ANGSTADT LLC, and pursuant to the provisions of FRCP 34(a)(2)(b)(1), the parties agree, and hereby stipulate, that the inspection shall be conducted within the following parameters:

At 11:00 a.m., on October 28, 2015, at the premises of Walmart Store No. 5101, located at 300 South Highway 160, Pahrump, Nevada, Defendant shall permit Plaintiff, Ruth Ann Stedeford; Plaintiff's counsel, Jared Anderson, Esq.; and Plaintiff's designated expert, Thomas A. Jennings (collectively, "Plaintiff's group") entry upon designated land or other property in control of the party upon whom request is served for the express purposes of inspection, measurement, surveying, photography, and non-destructive and non-invasive testing of the property, specifically the floor near

the self-checkout area upon which Plaintiff allegedly fell on December 11, 2013, and the surrounding area for a distance of up to ten (10) feet in any or all directions from the location of Plaintiff's alleged fall, using only manual and visual inspection, measuring and surveying tools, such as a hand-operated English XL device or similar device to measure coefficient of friction.

Members of Plaintiff's group may utilize still photography of the area upon which Plaintiff fell on December 11, 2013, and the surrounding area for a distance of up to ten (10) feet in any or all directions from the location of Plaintiff's alleged fall, but may not create a videotape or recording of any kind. No member of Plaintiff's group shall speak to any member of Walmart personnel during the inspection.

DATED this 26th day of October, 2015.

INJURY LAWYERS OF NEVADA

/s/ Jared Anderson

JARED ANDERSON, ESQ.
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(702)868-8888

*Attorneys for Plaintiff
Ruth Ann Stedeford*

DATED this 26th day of October, 2015.

PHILLIPS, SPALLAS & ANGSTADT LLC

/s/ Timothy J. Lepore

TIMOTHY J. LEPORE
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*Attorneys for Defendant
Wal-Mart Stores, Inc.*

IT IS SO ORDERED.

DATED this 2nd day of November, 2015.


UNITED STATES MAGISTRATE JUDGE